

August 30, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

**In Re: Docket Nos. 2021-9-E and 2019-226-E; Dominion Energy South Carolina,  
Incorporated's 2021 Integrated Resource Plan (IRP)**

Dear Ms. Boyd:

The South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") write in response to the letters filed by the South Carolina Office of Regulatory Staff ("ORS") and Dominion Energy South Carolina ("DESC") requesting that the Commission revisit its notice of hearing and prefiling schedule in the above-referenced proceeding. Counsel for Sierra Club and the Carolinas Clean Energy Business Association ("CCEBA") have reviewed and also support the request below.

First, CCL, SACE, Sierra Club, and CCEBA (collectively, "Clean Energy Intervenors") support ORS's and DESC's request that the Commission revisit its notice of hearing and prefiling schedule in this proceeding. Act 62 specifically requires that ORS prepare a report on all IRP updates, and 120 days is a reasonable time frame for ORS to prepare such a report. We further support DESC's proposal to allow parties to file written comments thirty (30) days after the ORS Report is filed, with responsive comments due fourteen (14) days thereafter. *See* DESC Ltr. dated Aug. 27, 2021, at 2, Dkt. 2021-9-E. DESC's proposed comment schedule would allow all parties adequate time to review the IRP Update, serve discovery, and prepare comments for the Commission's consideration.

However, Clean Energy Intervenors disagree with DESC that a paper-only proceeding is required for all IRP Update proceedings. Though Act 62 does not specifically require a hearing for IRP Updates, it certainly does not prohibit one, and the Commission has broad general authority and discretion to schedule a hearing if it believes that may be necessary. *See generally* S.C. Code Ann. § 58-27-140(A). Some IRP Updates may involve more significant changes than others, and a hearing may be appropriate to address some of those particular issues. For example, the Commission ordered DESC to make several significant changes to its assumptions in methodologies in its 2021 IRP Update.

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As such, Clean Energy Intervenors propose that parties be permitted, in their report or comments, to request a hearing or oral argument on particular issues, with the Commission having the ultimate discretion on whether to schedule a hearing on those issues.

Lastly, the Clean Energy Intervenors respectfully request expedited consideration of these matters in light of the approaching deadline for direct testimony on September 9, 2021.

Sincerely,

s/ Kate Mixson

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